Remarks

Entry of the amendments, reconsideration of the application, as amended, and allowance of all pending claims are respectfully requested. Claims 1 and 4-72 remain pending.

With the above amendments, some of the claims have been amended to recite that, in one example, the ordered list is created for and used by a particular client node. Support for this amendment can be found throughout the specification (e.g., p. 61, lines 23-25; p. 62, lines 4-7; and p. 62, lines 16-17), and thus, no new matter is added.

Additionally, various claims indicated as allowable in the Office action have been rewritten in independent form. Applicants gratefully acknowledge the indication of allowability of claims 8-11, 22, 30-33, 44, 56-59 and 70.

In the Office Action, dated September 8, 2003, claims 1, 4-7, 12-19, 21, 23-29, 34-43, 45-55, 60-69 and 71-72 are rejected under 35 U.S.C. 102(e) as being anticipated by Christensen et al. (U.S. Patent No. 6,330,605). Additionally, claims 20, 42 and 68 are rejected under 35 U.S.C. 103(a) as being unpatentable over Christensen. Applicants respectfully, but most strenuously, traverse these rejections to any extent deemed applicable to the claims presented herewith.

Applicants' invention is directed, in one aspect, to providing ordered lists of service addresses to client nodes to enable those client nodes to access a service associated with those service addresses. Each ordered list is specifically ordered for that particular client node based on one or more characteristics of the client node. Thus, different client nodes are given differing ordered lists to diversify how the different client nodes access a particular service.

As one particular example, applicants claim a method of providing ordered lists of service addresses (e.g., independent claim 1). The method includes, for instance, creating an ordered list of service addresses to be used by a client node of a computing environment to reach a service of the computing environment. The creating uses a predefined equation to order a plurality of service addresses having the same ordering criterion, the predefined equation

balances use of the plurality of service addresses among the client node and at least one other client node of the computing environment. The ordered list is used by the client node to reach the service, wherein the ordered list is ordered specifically for the client node based on one or more characteristics of the client node. Thus, in one aspect of applicants' claimed invention, a client node, as one example, is provided an ordered list of service addresses that is specific to that client node, and the client node uses those service addresses to access a particular service. This is very different from the teachings of Christensen.

In Christensen, there is no discussion, teaching or suggestion of tailoring a list of service addresses to a particular client node. Instead, in Christensen, each client is provided with all of the mapped associated network addresses (see, e.g., Col. 2, lines 28-33). There is no distinction in Christensen of the list that is provided to one client versus the list that is provided to another client.

Unlike one aspect of applicants' claimed invention, Christensen focuses its attention on the server nodes rather than the client nodes. That is, Christensen describes a technique in which a server node (e.g., a processor/memory mechanism (PMM) of a cache proxy) is assigned a list of addresses for which it is responsible. Each PMM has its own list of addresses and when a request comes in from a client that includes any one of the network addresses, the PMM assigned to that address services the request for the client. Thus, any creating of lists or ordering that is performed in Christensen is for the server nodes and not for the client nodes, as claimed by applicants. The client nodes in Christensen are simply given a list of all the network addresses. This list is not ordered specifically for the client nodes. Thus, applicants respectfully submit that Christensen fails to describe, teach or suggest one or more aspects of applicants' claimed invention.

For instance, Christensen fails to describe, teach or suggest applicants' claimed element of creating an ordered list of service addresses to be used by a client node of a computing environment. Further, Christensen fails to describe, teach or suggest using a predefined equation that balances use of the plurality of service addresses among the client node and at least one other client node of the computing environment. Yet further, Christensen fails to describe, teach

or suggest, wherein the ordered list is ordered specifically for the client node based on one or more characteristics of the client node. For at least these reasons, applicants respectfully request an indication of allowability for independent claim 1, as well as independent claims 25, 47 and 51.

Further, applicants respectfully submit that independent claims 18, 40, 48 and 66 are patentable for one or more of the same reasons indicated above. For example, independent claim 18 recites that the list is ordered for a specific client node based on one or more characteristics of the client node. As described above, Christensen fails to describe, teach or suggest creating an ordered list for a client node, creating an ordered list for a specific client node and/or creating an ordered list for a specific client node based on one or more characteristics of the client node. Thus, applicants respectfully request an indication of allowability for independent claim 18, as well as independent claims 40, 48 and 66.

Moreover, the dependent claims are patentable for the same reasons as the independent claims, as well as for their own additional features. Thus, applicants respectfully request an indication of allowability for all pending claims.

Should the Examiner wish to discuss this case with applicants' attorney, please contact applicants' attorney at the below listed number.

Respectfully submitted,

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